



Driving progress
through partnership

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Via Electronic Filing (ECF)

The Honorable Gabriel W. Gorenstein
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *LRN Corp. v. Markel Ins. Co.*, No. 1:-20-cv-8431-AJN-GWG

Dear Judge Gorenstein:

This letter is submitted jointly on behalf of Plaintiff, LRN Corp. ("LRN") and Defendant, Markel Insurance Co. ("Markel"), (collectively "the Parties") in the above-captioned insurance coverage action (the "Action").

As Your Honor is aware, by letter dated June 30, 2022, the Parties requested the Court to lift the stay of this Action because the Parties had reached an impasse in the settlement negotiations. On July 11, 2022, the Court endorsed the Parties' revised Scheduling Order (Dkt. 91) which set deadlines for discovery starting in August and continuing through February 2023.

This letter is to update Your Honor that the Parties to this Action have reached an agreement in principle to settle, contingent upon the settlement of the underlying action styled *Robert A Davidow v. LRN Corp., et al.*, pending in the Delaware Chancery Court, Case No. 2019-0150-MTZ (the "*Davidow* Litigation"). The parties to the *Davidow* Litigation currently are in serious settlement discussions. In light of the Parties' agreement in principle to settle the Action, and to conserve the Court's resources, the Parties request that the Court issue a stay of the Action to allow for the underlying parties to settle the *Davidow* Litigation. The Parties will provide the Court a status update by Friday, September 2, 2022.

Respectfully Submitted,

/s/ David M. Halbreich

David M. Halbreich

DMH:sd

cc: All Counsel of Record (via ECF)